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January 14, 2025

VIA ECF

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Pania et al. v. Crunch Holdings, LLC, No. 1:24-cv-7127-MKV

Dear Judge Vyskocil:

We represent Plaintiffs Camille Pania and Rashiya Al-Nurridin (“Plaintiffs”) in the above-referenced action. Pursuant to Rule 7.1(d) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and Rule 2(G) of this Court’s Individual Rules, we write to request that Plaintiffs’ deadline to oppose Defendants’ Motion to Compel Arbitration (the “Motion”) (ECF No. 26), currently January 20, 2025, be extended to March 14, 2025. Defendants consent to this request in connection with the parties’ agreement described below.

This is Plaintiffs’ second request for an extension of its deadline to respond to the Motion to Compel Arbitration. Plaintiffs respectfully submit that there is a good cause for the extension. The parties are currently negotiating a stipulated discovery and briefing schedule for resolving Defendant’s Motion. The parties anticipate that the stipulated schedule will incorporate (1) Defendant seeking unopposed leave to file an amended Motion (and accompanying memorandum and declaration), and (2) a March 14, 2025 deadline for Plaintiffs to oppose the Motion.

The parties anticipate submitting the stipulated discovery and briefing schedule to the court shortly. However, they are still finalizing certain details and awaiting client approvals, and understand that the Court may not be able to rule on the stipulated schedule until after the current January 20, 2025 deadline for Plaintiffs to oppose the Motion. Plaintiffs therefore respectfully submit this unopposed letter motion seeking an extension of the opposition deadline until March 14, 2025.

This request will not affect any other deadlines currently scheduled in this case.

Respectfully submitted,

s/ Tyler K. Somes

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